

ORIGINAL

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

2008 JAN 24 AM 9:46

WILLIAM BOYD,

Plaintiff

VS.

THEODORE NANNAS,

Defendant

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Civ. No. 07-378-JJF

Plaintiff  
William Boyd  
602 Tamara Circle  
Newark, DE 19711  
(302) 368-9049

Date: 01/23/08

**MOTION FOR RECONSIDERATION**

### **MOTION FOR RECONSIDERATION**

#### **FACTS**

Ted Nannas was my accountant for numerous years. He does accountant work in the tri-state in the tri-state area.

I, William Boyd owned two different employment agencies (Allstaff, Inc. and Band R, Inc.). The agencies were doing business at two different times of each other. I can not open another company because of worker compensation problem and tax problem caused by the embezzlement, theft and identity theft, bank fraud, mail fraud and extortion. My personal credit is permanently damaged because of the money that was embezzled and stolen from Allstaff, Inc. and B and R, Inc. My ability of obtaining a job from a separate employer is permanently handicapped because of the damaged credit report.

#### **RESPONSE**

Ted Nannas did my accountant work for numerous years. His service was limited and or stalled with no explanation. He never said he was not going to provide me accountant service. He just came up with a lot of excuses for the delay of service. Ted Nannas strung this out for years. The main focus should be on why Ted Nannas did what he did. The courts wrote that I am taking him to court because he stopped doing my taxes. But, that is wrong and I would like to clarify it. The reason I have a claim against Ted Nannas is his for his actions and how the actions violated my rights, Allstaff and B and R and (any other similar companies).

I later found out that Jack Boyd sold a company in my name for millions of dollars. Ted Nannas was Jack Boyd's accountant too. I put a lot together when I realized if he did my books in the proper manner he would have to do one of two things; either lie to me and lie on my tax papers and say that I did not have my name on the company that made millions or Ted would have to come out tell me the truth that Jack and him (Ted) used my name and my identity to make millions which destroyed me, Allstaff and B and R. So, Ted chose to stall me out and not tell me the truth of what was going on. Ted decided if he delayed my service long enough I would have to go to someone else to do my accountant work. Which the new accountant would have no clue about this million dollar transaction and I did not know about this million dollar transaction. The new accountant would report what I knew about as my income. Ted Nannas is a major player in this conspiracy.

I claim that Ted Nannas has violated my rights on the grounds of the antitrust laws. Also, Ted Nannas has committed embezzlement, extortion, identity theft, and bank fraud to destroy my companies (Allstaff, Inc. and B and R). Ted Nannas also damaged my

personal credit, my ability to obtain workers compensation for another (possible new) company and my ability to find a job because my credit is damaged.

Ted Nannas has conspired with John (Jack) Boyd, Wilmington Trust, Tempay, Insurance and Financial Services, Krista Garrettson, Stratus, Robin (Rizzo) Boyd and Harry Morris. This conspiracy has eliminated William Boyd's Allstaff, Inc and B and R, Inc. (as well as William Boyd ever having another (new) company) from ever competing in this industry. Ted Nannas knew that my identity was being used and damaged for life. Ted Nannas chose to stall my services hoping that it would go away. Ted Nannas chose not to inform me of what was going on. Ted Nannas actions and lack of service violated or should I say the service he chose to give me violated my rights. Ted Nannas has involvement in destroying Allstaff, Inc., B and R, Inc. and William Boyd.

Ted Nannas has a conspiracy with John Boyd, Tempay, Wilmington Trust, Insurance and Financial Services, Krista Garrettson, Robin Boyd and Harry Morris. The conspiracy picks and chooses who will succeed and who will fail in this horizontal market. Ted Nannas has injured competition in this horizontal market. Ted Nannas picking and choosing who will succeed and who will fail (by embezzlement, theft and withholding client and employee information) eliminates all chances of fair competition. These actions restrain trade in this horizontal market. These action, also, have adverse effect on the interstate commerce (since Ted Nannas, Stratus, John Boyd's companies and Bill Boyd's companies [Allstaff and B and R] does business in several states across Delaware, Maryland, Pennsylvania and New Jersey). Ted Nannas has clients in the Tri-State area (Delaware, New Jersey, Pennsylvania and Maryland). Jack Boyd uses Ted Nannas as an accountant and Jack Boyd does business in several states also (DE, PA, NJ, and MD). Ted Nannas' involvement with embezzlement, extortion, identity theft, mail fraud and forgery is anticompetitive conduct that gives this group monopoly power (that they use illegally) over this horizontal market.

## **SUMMARY**

Ted Nannas violates the Sherman Act Section 1 and 2.

Also, Ted Nannas has committed bank fraud, forgery, embezzlement, identity theft, extortion, mail fraud and stealing (theft).

Ted Nannas conspired with John Boyd, Tempay, Wilmington Trust, Robin (Rizzo) Boyd, Insurance and Financial Services, Krista Garrettson, Harry Morris and Stratus to eliminate Bill Boyd, Allstaff's, B and R, and Bill Boyd's ability to compete in this horizontal market (as well as other companies similar to theses companies). Ted Nannas helped destroy B and R and me from ever competing again. Ted Nannas and how preformed his accountant service for me, Allstaff and B and R stunted and prevented any chances.

Sherman Act Sec. 1

Section I of the Sherman Act, 15 U.S.C. §1, requires that I plead an agreement exists between two or more entities and that the agreement unreasonably restrains trade. The agreement between Ted Nannas, John Boyd, Krista Garrettson, Wilmington Trust, Harry Morris, Robin Boyd, Insurance and Financial Services, Tempay, and Stratus Services creates a horizontal market division which isolates the financing needed and the temporary employment clients for construction and industrial field. They pick and choose who is going to succeed in this market. They committed bank fraud, forgery, embezzlement, identity theft, extortion, mail fraud and stealing (theft). This agreement and these actions that they agree on performing eliminates free trade of this horizontal market which creates an unreasonably restrain of trade in this market.

#### Sherman Act Sec. 2

Section II of the Sherman Act, 15 U.S.C. §2, prevents persons who monopolize or attempt to monopolize and persons who conspire to monopolize "any part of the trade or commerce among the several states". Ted Nannas, John Boyd, Wilmington Trust, Tempay, Krista Garrettson, Harry Morris, Robin Boyd, Insurance and Financial Services, and Stratus Services have monopolized, attempt to monopolized and conspired to monopolize the temporary employment clients for construction and industrial workers and the financing needed among several states.

Ted Nannas has clients in several states and that do business in several states (DE, MD, NJ, and PA). Ted Nannas provides accountant service to Jack Boyd which Jack Boyd does business in several states (DE, MD, NJ, and PA). Bill Boyd and his companies B and R and Allstaff, Inc.'s services several states and had clients from several states. Ted Nannas destroyed B and R by assisting Jack Boyd in the sale of B and R. Ted new and agreed with the sale of B and R in my name. Ted Nannas did not inform me of the sale when I was one his clients. Ted Nannas and Jack Boyd did not pay any taxes on this money (\$4 million plus dollars). Ted Nannas was involved in Jack Boyd receiving checks mad out to B and R (which was in Bill Boyd's name) and taking them to Wilmington Trust, depositing the checks and cashing the checks (without Bill Boyd ever knowing). Ted Nannas sabotaged not only B and R but also Allstaff and influenced its destruction. These actions destroyed me, Allstaff and B and R.

Through Ted Nannas', John Boyd's, Krista Garrettson's, Tempay's, Wilmington Trust's, Robin Boyd's, Insurance and Financial Services', Stratus Services' and Harry Morris' bank fraud, forgery, embezzlement, identity theft, extortion, mail fraud and stealing (theft) being willfully committed; this achieves and maintains the monopoly power. These anticompetitive actions foreclose competition and conspirers to monopolize this horizontal market of the temporary employment construction and industrial clients and the financing needs.

I respectfully ask this honorable Court to reconsider and proceed on with my complaint against Ted Nannas. There are processed checks, e-mails, police reports, mail, contracts

and more to verify all of these violations. I thank the Court in advance for its time and understanding in this matter.

Respectfully,

William Boyd

Date: 01/23/08